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Attorneys for Defendants  
 Hynix Semiconductor Inc. and Hynix  
 Semiconductor America Inc. in the *Sun/Unisys*,  
*Edge, Jaco* and *All-American* actions

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

Sun Microsystems, Inc. v. Hynix Semiconductor  
 Inc., et al.

Case No. C-06-01665-PJH

Unisys Corporation v. Hynix Semiconductor  
 Inc., et al.

Case No. C-06-02915-PJH

Jaco Electronics, Inc. v. Hynix Semiconductor  
 Inc., et al.

Case No. C-07-01212-PJH

Edge Electronics, Inc. v. Hynix Semiconductor  
 Inc., et al.

Case No. C-07-01207-PJH

Case No. C 06-01665-PJH  
 (Consolidated)

Case No. C-06-02915-PJH

Case No. C-07-01200-PJH

Case No. C-07-01207-PJH

Case No. C-07-01212-PJH

Case No. C-07-01381-PJH

**[PROPOSED]**  
**PRETRIAL ORDER NO. 1**

1 All-American Semiconductor, Inc. v. Hynix  
2 Semiconductor Inc., et al.

3 Case No. C-07-01200-PJH

4 DRAM Claims Liquidation Trust, by its Trustee  
5 Wells Fargo Bank, NA v. Hynix Semiconductor  
6 Inc., et al.

6 Case No. C-07-01381-PJH.

7  
8 On May 31, 2007, the Court held a joint Case Management Conference for  
9 each of the six cases listed herein. Plaintiffs Sun, Unisys, Edge, Jaco and All-American  
10 were represented by Crowell & Moring LLP and plaintiff DRAM Claims Liquidation  
11 Trust was represented by Lindquist & Vennum LLP and Sellar, Hazard, Manning, Ficenec  
12 & Lai.

13 Defendants Hynix Semiconductor Inc. and Hynix Semiconductor Inc. were  
14 represented by O'Melveny & Myers LLP with respect to the Sun, Unisys, Edge, Jaco and  
15 All-American actions; defendants Mosel Vitelic Inc. and Mosel Vitelic Corporation were  
16 represented by Heller Ehrman LLP; defendants Samsung Electronics Co., Ltd. and  
17 Samsung Semiconductor, Inc. were represented by Sheppard, Mullin, Richter & Hampton  
18 LLP; defendants Infineon Technologies AG and Infineon Technologies North America  
19 Corporation were represented by Kaye Scholer LLP; defendants Nanya Technology  
20 Corporation and Nanya Technology Corporation USA were represented by Orrick  
21 Herrington & Sutcliffe LLP; defendants Winbond Electronics Corporation and Winbond  
22 Electronics Corporation America were represented by Finnegan, Henderson, Farabow,  
23 Garrett & Dunner LLP; defendants Elpida Memory, Inc. and Elpida Memory (USA) Inc.  
24 were represented by Simpson Thacher & Bartlett LLP; defendant NEC Electronics  
25 America, Inc. was represented by Thelen Reid Brown Raysman & Steiner LLP;  
26 defendants Mitsubishi Electric Corp., Mitsubishi Electric and Electronics USA, Inc., and  
27 Mitsubishi Electric Europe B.V. were represented by Jenner & Block LLP and Krieg,  
28

Keller, Sloan, Reilley & Roman, LLP; and defendants Micron Technology, Inc, and Micron Semiconductor Products, Inc. were represented by Gibson Dunn & Crutcher LLP.

1. The Court adopts the following pre-trial schedule for these cases. Unless otherwise stated, each date below applies to every action listed above.

EVENT	COORDINATED SCHEDULE
Exchange Initial Disclosures in <i>Jaco</i> , <i>Edge All-American</i> and <i>DRAM Liquidation Trust</i> actions; MDL Defendants will produce MDL materials	6/14/07
Group mediation with Unisys	6/20/07
Group mediation with Sun	6/21/07
Follow-up mediations in <i>Sun/Unisys</i> actions	7/19/07 – 7/20/07
Fact discovery closes in all cases	11/16/07
Deadline for mediation in <i>Edge</i> , <i>Jaco</i> , <i>All-American</i> and <i>DRAM Liquidation Trust</i>	11/30/07
Deadline for Plaintiffs' expert reports	12/14/07
Depositions of Plaintiffs' experts	12/15/07-1/24/08
Deadline for Defendants' expert reports	1/25/08
Depositions of Defendants' experts	1/26/08-2/21/08
Deadline for Plaintiffs' expert rebuttal reports	2/22/08
Depositions of Plaintiffs' rebuttal experts	2/23/08-3/13/08
Deadline for dispositive motions	3/14/08
Deadline for Oppositions to dispositive motions	4/11/08
Deadline for Reply briefs in support of dispositive motions	4/30/08
Hearing held on dispositive motions	5/28/08
Pre-Trial Conference	9/11/08
Cases ready for trial; court to determine which case goes first	10/20/08

2. Any discovery disputes are referred to Magistrate Judge Spero for resolution.

3. Defendants are entitled to commence depositions of plaintiffs' experts when they file reports. If an expert submits both an expert report and a rebuttal

1 report, defendants are permitted to take a second deposition of that expert. A second  
 2 deposition of an expert for plaintiffs following submission of a rebuttal report shall be  
 3 limited to one-half day.

4 4. On June 4, 2007 defendants filed Motions to Dismiss in the  
 5 *Sun/Unisys* consolidated action and in the *DRAM Liquidation Trust*. Pursuant to the  
 6 Court's request, the parties have agreed to a briefing and hearing schedule for those  
 7 motions to dismiss as follows:

EVENT	SCHEDULE
Defendants' motions to dismiss filed	6/04/2007
Plaintiffs' opposition briefs filed	7/16/2007
Defendants' reply briefs filed	8/13/07
Hearing on each motion	9/12//07

14 SO ORDERED.

17 Dated: 6/25/07

